



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TX 75202-2733

Rec'd  
5/5/2000

April 28, 2000

Mr. David Cobrain  
RCRA Permits Management Program  
Hazardous & Radioactive Materials Bureau  
2044-A Galisteo  
Santa Fe, New Mexico 87502

RE: Comments on the Giant, Ciniza Refinery, Land Treatment Unit,  
RCRA Post-Closure Care Permit, EPA ID No. NMD000333211

Dear Mr. Cobrain,

On Thursday April 6, 2000 the Environmental Protection Agency (EPA) received a copy of the Giant Ciniza Refinery, Land Treatment Unit, RCRA Post-Closure Care Permit and your request for EPA's technical review. Enclosed are EPA's comments on the Giant, Ciniza Post Closure Care Permit and the New Mexico Environment Department Routing Slip initialed by EPA confirming our review of the Permit. If you have any questions or require further assistance please contact James Harris of my staff at (214) 665-8302.

David Neleigh, Chief

  
New Mexico and Federal  
Facilities Section (6PD-N)

**Comments on the Giant, Ciniza Refinery, Land Treatment Unit, RCRA  
Post-Closure Care Permit, EPA ID No. NMD000333211**

1. Section J, Solid Waste Management Units: Prior to NMED receiving HSWA authorization EPA approved SWMUs 1 (Aeration Basin), 2 (Evaporation Ponds), 3 (Empty Container Storage Area), 9 (Drainage Ditch and Inactive Landfarm), 11 (Secondary Oil skimmer) and 13 (Drainage Ditch Between API Evaporation Ponds and Neutralization Tank Evaporation Ponds) for conditional No Further Action (NFA). The permit should indicate that those SWMUs have been removed from the permit and provide an opportunity for public comment on the removal.
2. Table J-1, Solid Waste Management Units: SWMUs 5 (Landfill Areas), 6 (The Tank Farm-Leaded Gasoline Tanks), 7 (Fire Training Area), 8 (The Railroad Rack Lagoon) and 10 (The Sludge Pits) are undergoing corrective action via Voluntary Corrective Action Plans (VCAP). The permit should impose a schedule for completion of the VCAP for each unit. The RFI process is completed at SWMUs 4 (Old Burn Pit) and 12 (Contact Wastewater Collection system). The permit should also impose a schedule for imposing a corrective measure study and corrective measure implementation.
3. Region 6 - Human Health Medium Specific Screening Levels: The most recent version of the table is July 12, 1999.